

Plaintiff has not yet received Dr. Frisk's report. Plaintiff will supplement immediately upon receipt. Undersigned counsel attempted to contact Defendants' counsel to enter a stipulation regarding Dr. Frisk's report upon learning the report is not yet available but was unable to do so prior to the deadline. Plaintiff will stipulate to an extension of Defendants' deadline to disclose experts by the same number of days required by Plaintiff to provide Dr. Frisk's report.

2. Paul K. White, MD CLCP
Life Care Plans, MD
171 Huntington Road
Atlanta, GA 30309

Dr. White was retained by Plaintiff to prepare a life care plan for Plaintiff's future medical needs and medical expenses resulting from the injuries sustained in the subject collision. Dr. White will offer opinions within a reasonable degree of medical probability on the Plaintiff's future medical needs and the reasonable costs of the same.

Reports from this expert with the contents required by Fed. R. Civ. P. 26(a)(2)(B) were provided to Defendants and their counsel on December 12, 2024.

Plaintiff reserves the right to elicit expert testimony from individuals named as experts by other parties or treating physicians and medical care providers to this case. Plaintiff further reserves the right to supplement this disclosure later should the case develop in such a way to warrant additional expert testimony on Plaintiff's behalf.

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Respectfully submitted,

MORGAN & MORGAN, P.A.

/s/ Cooper Klaasmeyer

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Attorneys for the Plaintiff

February 12, 2025

North Charleston, SC